

June 29, 2016

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VIA ECF

Honorable Analisa Torres
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: *Rogers v. Fashion Institute of Technology et al.*
14 Civ. 06420 (AT) (DCF)**

Dear Judge Torres:

We represent Defendants Fashion Institute of Technology and Mario Federici in the above-referenced action. On February 26, 2016, Your Honor granted Defendants' motion to dismiss the Complaint with leave to amend. At Plaintiff's request, the Court extended that leave to June 17, 2016. On June 23, 2016, we received an ECF notice that Plaintiff had filed an Amended Complaint. In the Amended Complaint, Plaintiff names only three parties as Defendants: Fashion Institute Technology, Mario Federici, and Henry Welt. My law firm and I continue to represent two of the overlapping Defendants, Fashion Institute of Technology and Mario Federici (collectively, the "Served Defendants") and we may be retained to represent the third named defendant, Henry Welt, whom Plaintiff does not appear to have served yet.

In light of the changed defendants and density of the Amended Complaint (127 paragraphs over 47 pages), and the difficulty of communicating efficiently with Plaintiff, who is still proceeding *pro se*, we write to respectfully request that the Served Defendants' time to move, answer and/or otherwise respond to the Complaint be extended to and including August 12, 2016.

We also seek to confirm that since Plaintiff is still appearing *pro se*, there is no pre-motion conference requirement in the event some or all of the Defendants move to dismiss the Amended Complaint.

We appreciate the Court's time and consideration of this request.

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Respectfully submitted,

/s/ Bertrand B. Pogrebin

Bertrand B. Pogrebin

cc: Alvin Rogers (by mail)